

**Quarles & Brady LLP**  
Firm State Bar No. 00443100  
One S. Church Ave., Suite 1700  
Tucson, Arizona 85701-1621  
TELEPHONE 520.770.8700  
FACSIMILE 520.623.2418

Susan G. Boswell (AZ Bar #004791)  
susan.boswell@quarles.com  
Elizabeth S. Fella (AZ Bar #025236)  
elizabeth.fella@quarles.com

Attorneys for the Ursuline Western Province

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA**

In re:	) Chapter 11
	)
ROMAN CATHOLIC BISHOP OF	) Case No. 14-60074
HELENA, MONTANA, a Religious	)
Corporation Sole (Diocese of Helena),	)
	)
Debtor.	)

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**MOTION FOR WAIVER OF LOCAL COUNSEL REQUIREMENT**

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Ursuline Western Province (“**Ursuline**”), a creditor and party-in-interest in the above-captioned Chapter 11 case of the Roman Catholic Bishop of Helena, Montana, by and through their counsel of record, Susan G. Boswell and Elizabeth S. Fella of Quarles & Brady LLP, hereby move this court for a waiver of Mont. LBR 2090-1(e) requiring the association of local counsel for attorneys who are not otherwise authorized to practice law before the United States Bankruptcy Court for the District of Montana. In support thereof, Ursuline states as follows:

1. Pursuant to Mont. LBR 2090-1(e), the requirement to associate a local attorney may, on motion, be waived by the Court on a case-by-case basis. Ursuline believes that good cause exists for such a waiver here.

2. Concurrent with the filing of this motion, counsel will file applications to appear pro hac vice in this case.

3. Susan G. Boswell and Elizabeth S. Fella of Quarles & Brady LLP filed a “Notice of Appearance and Request for Special Notice” [Dkt. No. 87] on February 28, 2014.

4. Counsel are experienced Chapter 11 attorneys having appeared on behalf of creditors and debtors in various states including, but not limited to, Arizona, Nevada, New Mexico, California, Missouri, Illinois, Delaware, Alaska, and Oregon. Counsel has significant experience in the reorganization cases and proceedings related to Dioceses through their representation as counsel for the Roman Catholic Church of the Diocese of Gallup, the Catholic Bishop of Northern Alaska, the Roman Catholic Diocese of Tucson and the Roman Catholic Bishop of San Diego. In addition, counsel have significant experience in representing other types of religious organizations. Counsel believe that their experience lessens the requirement for association of local counsel.

5. In addition, Susan G. Boswell has previously appeared before the United States Bankruptcy Court for the District of Montana representing a creditor in the Jore Corporation case, Case. No. 01-31609-RBK.

WHEREFORE, Ursuline respectfully requests that the Court enter an Order:

- A. Waiving the requirement of association of local counsel as required by Mont. LBR 2090-1(e); and
- B. Granting such other and further relief as the Court deems just and proper under the circumstances.

RESPECTFULLY SUBMITTED this 17th day of March, 2014.

/s/ Susan G. Boswell

Susan G. Boswell (AZ Bar No. 004791)  
Elizabeth S. Fella (AZ Bar No. 025236)  
QUARLES & BRADY LLP  
One S. Church Ave., Suite 1700  
Tucson, Arizona 85701  
(520) 770-8700  
Fax: (520) 623-2418  
susan.boswell@quarles.com  
elizabeth.fella@quarles.com

**CERTIFICATE OF SERVICE**

Pursuant to Mont. LBR 7005-1, 9013-1(c) and 9036-1, the undersigned hereby certifies under penalty of perjury that a copy of the forgoing “Motion for Waiver of Local Counsel Requirement” was served on March 17, 2014 via the notice transmission facilities of the Bankruptcy Court’s CM/ECF system to all parties listed on the ECF service list for this case.

/s/ Susan G. Boswell  
Susan G. Boswell